



2. Plaintiff's imprisonment will greatly limit his ability to litigate, The issues involved in this case are complex, and will require significant research and investigation. Without counsel, Plaintiff will not be able to fairly and adequately represent the interest of the class. Plaintiff have no interests contrary to those of the class members.


3. Plaintiff's purpose to seek (Representation) to represent Plaintiff and a class composed of all inmates who currently are, who in the future will be, incarcerated at the Eastham Unit, and who are subjected to (TDCJ's) policy and practice of failing to regulate Unconstitutional Conditions and the High apparent indoor temperature in the housing and facilities areas. Plaintiff is typical of class members.

4. A trial in this case will likely involve conflicting testimony, and counsel would better enable Plaintiff and class members to present evidence and cross examine witnesses.

5. Plaintiff and subclass members have serious medical conditions that increase our risk of heat-related illness, injury, or death (including, but not limited to, suffering from obesity, diabetes, hypertension, cardiovascular disease, psychiatric conditions, cirrhosis of the liver, chronic obstructive pulmonary disease, and asthma that will limit our ability to represent Plaintiff and class members.

WHEREFORE, Plaintiff prays that this Honorable Court grant his request that counsel be appointed to <sup>TE</sup>present him and class members Constitutional Rights to be free of Cruel and Unusual Punishment.

Respectfully submitted,

  
Jesse Paul Skinner, pro se  
#0000# 599362/Eastham  
2665 Prison Rd.#1  
Lovelady, Texas 75851

Certificate of service

42 U.S.C.A. §1746

I declare under penalty of perjury that the foregoing are true and correct, and that a copy of Plaintiff's motion for appointment of counsel was served on the Office of the Clerk Eastern District Court of Texas Lufkin Division on this 30 of July, 2018, by placing same in the (TDCJ) Mail System.

  
Jesse P. Skinner

Mr. Jesse P. Skinner  
TDCJ# 599362/Eastham  
2665 Prison Rd. #1  
Lovelady, Texas 75851

July 30, 2018

Office of the Clerk  
United States District Court  
Eastern District of Texas  
104 North Third Street  
Lufkin, Texas 75901

RE: Jesse Paul Skinner V. Bryan Collier et al, Plaintiff's  
Motion For Appointment of Counsel:

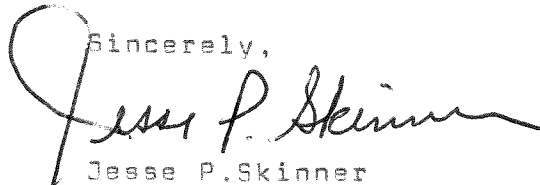
Dear Hon. Clerk:

Please find the original and one copy enclosed of Plaintiff's  
Motion for Appointment of Counsel. Please inform Plaintiff  
of any movement by the court.

Also, forward (Docket Sheet) to Plaintiff with the case  
number in the above civil action.

I thank you for your time and attention to this matter!  
I Await your response. I Remain.

Sincerely,



Jesse P. Skinner  
pro se

cc/jps/apl/file

Mr. <sup>Jessie</sup> Jesse P. Skinner  
TDCJ# 599362/Eastham  
2665 Prison Rd.#1  
Lovelady, Texas 75851

NORTH TEXAS TX PSDC  
DALLAS TX 750  
30 JUL 2018 PM 9 L



Office of the Clerk  
United States District Court  
Eastern District of Texas  
104 North Third Street  
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75901-989135

